

Guy B. Wallace – 176151
 Mark T. Johnson – 76904
 Jennifer U. Bybee – 302212
 Travis C. Close – 308673
 Rachel L. Steyer – 330064
**SCHNEIDER WALLACE
 COTTRELL KONECKY LLP**
 2000 Powell Street, Suite 1400
 Emeryville, California 94608-1863
 Telephone: (415) 421-7100
 Facsimile: (415) 421-7105
 Email: gwallace@schneiderwallace.com
 mjohnson@schneiderwallace.com
 juhrowczik@schneiderwallace.com
 tclose@schneiderwallace.com
 rsteyer@schneiderwallace.com

Gay Crosthwait Grunfeld – 121944
 Jenny S. Yelin – 273601
 Adrienne Spiegel – 330482
 Maya Campbell – 345180
**ROSEN BIEN
 GALVAN & GRUNFELD LLP**
 101 Mission Street, Sixth Floor
 San Francisco, California 94105-1738
 Telephone: (415) 433-6830
 Facsimile: (415) 433-7104
 Email: ggrunfeld@rbgg.com
 jyelin@rbgg.com
 aspiegel@rbgg.com
 mcampbell@rbgg.com

Kathryn A. Stebner – 121088
 Brian S. Umpierre – 236399
**STEBNER GERTLER & GUADAGNI
 A Professional Law Corporation**
 870 Market Street, Suite 1285
 San Francisco, California 94102-2918
 Telephone: (415) 362-9800
 Facsimile: (415) 362-9801
 Email: kathryn@sgg-lawfirm.com
 brian@sgg-lawfirm.com

David T. Marks – *pro hac vice*
**MARKS, BALETTE, GIESSEL
 & YOUNG, P.L.L.C.**
 7521 Westview Drive
 Houston, Texas 77055
 Telephone: (713) 681-3070
 Facsimile: (713) 681-2811
 Email: davidm@marksfirm.com

Attorneys for Plaintiffs and the Certified Subclasses

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

STACIA STINER; RALPH CARLSON, in his
 capacity as Trustee of the Beverly E. Carlson and
 Helen V. Carlson Joint Trust; LORESIA
 VALLETTE, in her capacity as representative of
 the Lawrence Quinlan Trust; MICHELE LYTLE,
 in her capacity as Trustee of the Boris Family
 Revocable Trust; RALPH SCHMIDT, by and
 through his Guardian Ad Litem, HEATHER
 FISHER; PATRICIA LINDSTROM, as successor-
 in-interest to the Estate of ARTHUR
 LINDSTROM; BERNIE JESTRABEK-HART;
 and JEANETTE ALGARME; on their own
 behalves and on behalf of others similarly situated,

Plaintiffs,

v.

BROOKDALE SENIOR LIVING, INC.;
 BROOKDALE SENIOR LIVING
 COMMUNITIES, INC.; and DOES 1 through 100,
 Defendants.

Case No. 4:17-cv-03962-HSG

**STIPULATION AND ORDER
 DIRECTING LODGING OF
 CONFIDENTIAL DOCUMENT WITH
 COURT FOR IN CAMERA REVIEW**

Judge: Hon. Haywood S. Gilliam, Jr.

1 Plaintiffs and Defendants (collectively, the “Parties”), by their undersigned counsel,
2 stipulate as follows:

3 WHEREAS, the Parties have resolved all of Plaintiffs’ claims, through a Class Action
4 Settlement, submitted to the Court on March 17, 2025 with Plaintiffs’ Motion for Preliminary
5 Approval, ECF No. 1026, as well as through a confidential settlement agreement resolving
6 Plaintiffs’ individual claims;

7 WHEREAS, the Parties wish to provide the Court with a courtesy copy of the confidential
8 settlement agreement for the Court’s in camera review and reference;

9 WHEREAS, the Parties have agreed to keep the individual settlement agreement
10 confidential, except for select terms, and therefore do not consent to filing the document on the
11 public docket, even in a sealed or redacted form;

12 WHEREAS, the Parties provided a courtesy copy of the document by email to the Court’s
13 courtroom deputy on March 17, 2025 at 3:49 p.m., but understand that the document may not be
14 provided to the Court without an order so directing;

15 THEREFORE, the Parties request that the Court direct the courtroom deputy to provide the
16 document to the Court for in camera review.

17 IT IS SO STIPULATED.

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19 DATED: March 18, 2025

Respectfully submitted,

20 ROSEN BIEN GALVAN & GRUNFELD LLP

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22 By: /s/ Jenny S. Yelin

Jenny S. Yelin

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24 Attorneys for Plaintiffs and the Certified Subclasses
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Respectfully submitted,

DATED: March 18, 2025

MOORE & LEE, P.C.

By: /s/ Jenny S. Yelin

Erica Rutner


Attorneys for Defendants

ORDER

The Parties' Stipulation is granted, and the Court directs the Courtroom Deputy to forward the confidential agreement received via e-mail on March 17, 2025 at 3:49 p.m. to the Court for in-camera review.

IT IS SO ORDERED.

DATED: 3/18/2025



Honorable Haywood S. Gilliam, Jr.
United States District Judge